

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-07-045

Lesco Design Inc

La Grange, Ky 40031

08/02/07

Yelena Goldin, Reviewer

SOURCE ID: 21-185-00042

AGENCY INTEREST: 35684

ACTIVITY: APE20070001

SOURCE DESCRIPTION:

Lesco-Design Inc. assembles conveyor and ramp systems primarily for automotive assembly plants at its LaGrange, KY location. The process consists of assembling portions of the conveyor or ramp, painting the assembled portion and shipping to destination for final assembly. The assembly process at the facility prior to shipping takes 40 hours for one conveyor or two ramp systems. The painting of the system takes 12 hours. The amount of paint per system is 55 gallons for one conveyor or two ramps. On May 15, 2007 the company submitted the application for a conditional major operating permit.

COMMENTS:

Lesco-Design uses several paints interchangeably for its spray operations.

Emission point (EP#1)-Paint spray Booth; hourly rate-4.583 gals/hr.

The company uses fiberglass panel filter of 90% efficiency to control PM/PM10 emissions and Kremlin Air Assisted Spray Gun, which has 60% transfer rate.

The emissions of Volatile Organic Compounds' (VOC) and Hazardous Air Pollutant's (HAP) are determined by material balance assuming the entire content of VOC/HAP in the applied material being emitted.

Since highest potential VOC emission is below 100 TPY, there is no cap limit for this criteria pollutant. The company took limits on single HAP and combined HAPs.

Applicable regulations:

- (a) 401 KAR 52:030, Federally-enforceable permits for non-major sources.
- (b) 401 KAR 59:010, New Process Operations.

Precluded regulations:

- (a) 40 CFR 63, subpart M-MMM-National Emission Standards for hazardous air pollutants-the HAP emission limits will preclude the applicability of this regulation.
- (b) 401 KAR 52:020, Title V permits for major sources-does not apply since the company took the limit of less than 9 TPY of any HAP and less than 22.5 TPY of combined HAPs.

EMISSION AND OPERATING CAPS DESCRIPTION:

HAP emissions shall not exceed 22.5 for combined HAPs and 9 tons for any single HAP during any consecutive twelve (12) month period. Monthly records to demonstrate compliance with limitations shall be maintained and total emissions shall be reported semiannually.

PERIODIC MONITORING:

The source will be required to monitor the twelve-month rolling total emissions of HAP. The source must maintain records of the purchase and usage of paints, thinners, clean-up solutions or any HAP containing material. Product data sheets or MSDS must be maintained onsite for at least 2 years from date of receipt of a HAP containing material.

OPERATIONAL FLEXIBILITY:

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.